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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PAT CASON-MERENDA and
JEFFREY A. SUHRE on behalf of
themselves and all others similarly situated,

Plaintiffs,

CASE NO.: 2:06-cv-15601

-v-

Hon. Gerald E. Rosen
Magistrate: Donald A. Scheer

DETROIT MEDICAL CENTER,
HENRY FORD HEALTH SYSTEM,
MC LAREN HEALTH CARE CORP, d/b/a
MOUNT CLEMENS REGIONAL MEDICAL
CENTER, f/k/a MOUNT CLEMENS GENERAL
HOSPITAL, ST. JOHN HEALTH PARTNERS,
OAKWOOD HEALTHCARE INC., BON
SECOURS COTTAGE HEALTH SERVICES,
WILLIAM BEAUMONT HOSPITAL, and
TRINITY HEALTH CORP.,

Defendants.

**DETROIT MEDICAL CENTER'S STIPULATED MOTION TO EXTEND TIME
TO RESPOND TO PLAINTIFFS' "MOTION TO STRIKE"**

Defendant, Detroit Medical Center (DMC), states as follows for its motion to extend time to respond to plaintiffs' "motion to strike improper expert opinion evidence proffered by defendant Detroit Medical Center:"

1. On December 21, 2009, plaintiffs filed their "motion to strike improper expert opinion evidence proffered by defendant Detroit Medical Center."

2. Plaintiffs' motion seeks to "strike" three illustrative charts which appeared in DMC's summary judgment briefs filed in April and June of 2009.

3. The undersigned will have sole responsibility for responding to the motion.

4. Due to other business commitments, and the holiday season, the undersigned is respectfully seeking a short extension, until January 18, 2010, to file DMC's response to the motion.

5. Plaintiffs' counsel has concurred in the relief requested in this motion.

6. A proposed Order is being submitted as a word document.

DETROIT MEDICAL CENTER,
LEGAL AFFAIRS

By: /s/ Charles N. Raimi

Charles N. Raimi (P29746)

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(313) 966-2226

Dated: December 23, 2009

CERTIFICATE OF SERVICE

I, Charles N. Raimi, an attorney of record in this case, hereby certify that I have caused a copy of the foregoing to be served electronically on the following counsel of record this 23rd day of December, 2009.

<p>Stephen F. Wasinger STEPHEN F. WASINGER PLC 26862 Woodward Avenue, Suite 100 Royal Oak, MI 48067-0958 E-mail: sfw@sfwlaw.com Counsel for plaintiffs</p>	<p>Mark A. Griffin Keller Rohrback 1201 Third Avenue, Suite 3200 Seattle, WA 98101 E-mail: mgriffin@kellerrohrback.com, Counsel for plaintiffs</p>
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<p>David Marx, Jr. McDERMOTT, WILL & EMERY 227 W. Monroe Street Chicago, IL 60606 E-mail: dm Marx@mwe.com, Counsel for Henry Ford Health System</p>	<p>David A. Ettinger HONIGMAN MILLER SCHWARTZ AND COHN LLP 660 Woodward Avenue, Suite 2290 Detroit, MI 48226-3506 E-mail: dettinger@honigman.com, Counsel for McLaren Health Care Corp.</p>
<p>Howard B. Iwrey DYKEMA GOSSETT 39577 Woodward Avenue, Suite 300 Bloomfield Hills, MI 48304-2820 E-mail: hiwrey@dykema.com Counsel for Oakwood Healthcare Inc.</p>	<p>Margo Weinstein SONNENSCHN NATH & ROSENTHAL 7800 Sears Tower Chicago, IL 60606-6404 mweinstein@sonnenschein.com Counsel for Trinity Health Corp.</p>
<p>Shari Ross Lahlou CROWELL & MORING LLP 1001 Pennsylvania Avenue, NW Washington, DC 20004-2595 slahlou@crowell.com, Counsel for Bon Secours Cottage Health Services</p>	<p>Michael R. Shumaker JONES DAY 51 Louisiana Avenue, N.W. Washington, D.C. 20001-2113 mrshumaker@jonesday.com, Counsel for St. John Health Partners</p>

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Date: December 23, 2009